

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:

(202) 326-7999

February 22, 2021

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court's order by memorandum endorsement of January 25, 2021, ECF No. 6603, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to bring the Court up to date on the status of the parties' efforts to propose redactions in accordance with the Court's order of November 24, 2020, ECF No. 6541. The Plaintiffs' Executive Committees ("Plaintiffs"), the Federal Bureau of Investigation ("FBI"), and Defendant Dallah Avco all join in this letter.

On January 31, 2021, counsel for Saudi Arabia circulated to the parties Saudi Arabia's responses to Plaintiffs' objections to certain proposed redactions for the Al Khalil and Kaldirim deposition transcripts. The responses narrowed the scope of the parties' disagreements, and counsel for Plaintiffs and for Saudi Arabia will meet and confer to attempt to further narrow such disagreements. Counsel for Saudi Arabia are currently working on proposed redactions for sealed filings leading up to the Court's November 25, 2019 order.

Plaintiffs have circulated to the parties today Plaintiffs' proposed redactions for FBI protected information in the sealed filings leading up the Court's November 25, 2019 and January 3, 2020 orders.

FBI has made substantial progress in reviewing the proposed redactions provided by the parties to date and has so far reviewed approximately 75% of those filings. FBI has not yet completed this review because it has been necessary to devote significant resources to reviewing the Court's February 1, 2021 Opinion and Order, conducting searches directed by that Order, and processing the resulting records, with a particular effort to produce records relating to Mohdar Abdullah in advance of his deposition commencing on March 1, 2021. However, FBI expects to complete its review of the proposed redactions provided to date within the next 1-2 weeks.

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Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before March 24, 2021.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)